

Remedium

March 10, 2010

U.S. Environmental Protection Agency **EPR-SR** 1595 Wynkoop Street Denver, CO 80202

Attn.:

Ms. Bonita Lavelle

Subject: OU3 RI/FS of the Libby Asbestos Site

Monthly Progress Report - February 2010

Dear Bonnie:

This progress report describes work completed during the month of February 2010, in accordance with Section IX of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study dated September 2007. A discussion of the actions taken, sampling results, planned activities, modifications, problems encountered, potential issues, anticipated delays, and solutions developed is provided below. Information by contractor is reported separately.

<u>MWH</u>

The following is a summary of the actions taken and progress made during February 2010.

A. ACTIONS TAKEN

- Delivered the Phase III Field Sampling Summary Report to EPA on February 1, 2010.
- Continued preparation of initial sections of the OU3 Remedial Investigation Report.

B. SAMPLING RESULTS

None.

C. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months.

- Continue preparation of the OU3 Remedial Investigation Report.
- Review and comment on draft Phase IV Sampling and Analysis Plan(s) as they are issued by EPA.

Robert J. Medler Director Remedium Group, Inc.

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Participate in teleconferences and other meetings as requested by EPA.

D. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

None.

Parametrix

The following is a summary of the actions taken and progress made during the month of February 2010.

A. ACTIONS TAKEN

- Continued small mammal data analysis.
- Continued coordination with histologist at Northwest Zoopath on small mammal tissues.
- Continued work on preparing the 2009 Small Mammal Program data report.
- Submitted draft 2009 aquatic program data report to Remedium and EPA.
- Coordinated with Bill Stubblefield on asbestos analytical studies necessary to support bioassays.
- Continued financial reporting, supervision and project management activities.

B. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months:

- Prepare and submit BTAG Subgroup recommendations memo (analytical, bioassay recommendations).
- Participate on a BTAG conference call to review subgroup analytical and bioassay recommendations.
- Receive histology report from NorthWest ZoopPath for use in preparing 2009 small mammal program data report.
- Submit 2009 small mammal program data report to Remedium and EPA.
- If a bioassay is deemed feasible given analytical challenges, prepare bioassay protocol for submission to Remedium and EPA.

C. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/ ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED The BTAG subgroup identified concerns with the analytical method(s) used for asbestos in surface water with regard to the reporting of clumped versus free fibers and resulting implications of the method(s) to providing an understanding and basis for evaluating aquatic exposure (and potential toxicity) in a planned bioassay. The Subgroup is continuing its work to develop a memo with recommendations that include approaches for addressing analytical method short comings, analytical challenges for conducting bioassays and any bioassay test modifications necessary should a bioassay be recommended.

Sincerely,

Robert J. Medler Project Coordinator

Remedium Group, Inc.

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cc: Michael DeDen - MWH

Lynne Gardner - Grace

John Garr - MWH

Robert Marriam - Grace Sue Robinson – Parametrix Dick Sloan – Montana DEQ